Peruvian Asparagus Importer's Association

BY EMAIL

December 5, 2005

Standardization Section, Fresh Products Branch Fruit and Vegetable Programs Agricultural Marketing Service U.S. Department of Agriculture 1400 Independence Ave. SW. Room 1661 South Building, Stop 0240 Washington, DC 20250-0240

Re: Proposal to Revise the United States Standards for Grades of Fresh Asparagus

Dear Sir or Madam:

On behalf of the Peruvian Asparagus Importers Association (PAIA), and in response to the Agricultural Marketing Service's (AMS) notice, we hereby submit these comments regarding the AMS's proposal to revise the U.S. Standards for Grades of Fresh Asparagus.

Importers in the United States import both green fresh asparagus and white fresh asparagus from Peru. While both green and white fresh asparagus from Peru are marketed in the United States, the color requirements of the current U.S. Standards for Grades of Fresh Asparagus only provide for the grading of green asparagus.

The revisions to the U.S. standards proposed by the AMS would modify the "color" element of Grades U.S. No. 1 and U.S. No. 2 by replacing the requirement that a proportion of the shaft that be "of a green color" with a requirement that this proportion of the shaft be "the color of the lot." The AMS determined that this revision "is warranted to facilitate the marketing of purple and white asparagus and improve the usefulness of the standards in better serving the industry." The AMS developed its proposed revisions after considering comments from received from interested parties, including representatives of U.S. asparagus growers in California and Michigan.

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United States Standards for Grades of Fresh Asparagus, 70 Fed. Reg. 58370 (October 6, 2005)

Id.

As described by the AMS, the proposed revisions to the U.S. Standards for Grades of Fresh Asparagus would facilitate the marketing of the full range of fresh asparagus products that U.S. importers import from Peru. On that basis, PAIA supports the proposed revisions.

If you have questions or require additional information, please feel free to contact the undersigned at (817) 793-3133.

Respectfully submitted,

/s/

Priscilla Lleras Coordinator PAIA